



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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DEC - 5 2012

Ref: 8EPR-N

Allen Rowley, Acting Forest Supervisor
Manti-La Sal National Forest
599 West Price River Drive
Price, Utah 84501

Re: Final Environmental Impact Statement for
Sunroc Corporation Chicken Creek Gypsum
Mine; CEQ # 20120352

Dear Mr. Rowley:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Final Environmental Impact Statement (EIS) prepared by the U.S. Department of Agriculture Forest Service (Forest Service) for the Sunroc Corporation Chicken Creek Gypsum Mine. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

Project Background and General Comments

The proposed project is located in the San Pitch Mountains of the Uinta National Forest and administered by the Sanpete Ranger District of the Manti-La Sal National Forest. Sunroc's proposed Plan of Operations includes expansion of existing mining operations at sites known as the East Mine and Lower West Mine, and addition of a third mining site called the Upper West Mine. Total proposed surface disturbance on National Forest land would be 77.3 acres, including 11.3 acres of existing disturbance, and there would be 37.1 acres of disturbance on private lands. 24.7 acres of new disturbance would be within the Levan Peak Inventoried Roadless Area (IRA). Under the proposal the mine would have a life of approximately 128 years. The Forest Service's Preferred Alternative in the Final EIS is to approve the Plan of Operations with additional mitigation measures needed to protect non-mineral National Forest resources.

According to the Record of Decision (ROD) available on the Manti-La Sal National Forest website, the Forest Service has selected the Preferred Alternative with modifications. The decision does not approve the Upper West Mine at this time, reducing new disturbance in the Levan Peak IRA from 24.7 acres to 5.3 acres. The Forest Service's decision represents a good balance of mineral production and environmental protection, because it provides the opportunity for consideration of changing

environmental concerns, markets and operational technology before approving further development on the Forest.

Air Quality

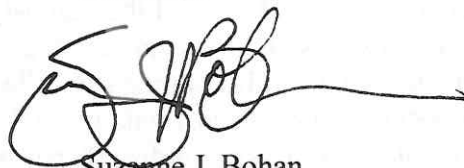
The EPA raised concerns during review of the Draft EIS that potential impacts to air quality should have been considered in greater detail, and we provided recommendations for an expanded analysis. The Final EIS includes some additional information in response to these recommendations, such as disclosure that the project area is currently in attainment of all National Ambient Air Quality Standards (NAAQS) and inclusion of the Utah Division of Air Quality Approval Order as an appendix. As we noted in our comments on the Draft EIS, while the permit is designed to protect air quality and prevent NAAQS exceedances, it does authorize a certain level of emissions and thus does not eliminate impacts to air quality and air quality related values (AQRVs) altogether. Consequently, existence of an air quality permit for mining operations does not substitute for a thorough analysis and disclosure of potential impacts to air quality.

For future EISs for mining operations on the Forest, we recommend including the following information:

- Disclosure of existing air quality conditions including relevant background concentrations for criteria pollutants;
- An emissions inventory in summary form within the body of the EIS; and,
- An analysis of potential impacts to air quality and AQRVs based on the emissions inventory and the proximity to sensitive receptors.

Thank you for the opportunity to comment on this Final EIS. If you have any questions or would like to discuss our comments, please contact me at (303) 312-6925. You may also contact Molly Vaughan, lead reviewer for this project, at (303) 312-6577 or by email at vaughan.molly@epa.gov.

Sincerely,



Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

